

## EXHIBIT A

CAUSE NO. 2022CI04852

ANISSA REMO  
Plaintiff

VS.

LYFT, INC.  
Defendant

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§

IN THE DISTRICT COURT OF

BEXAR COUNTY, TEXAS

\_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Anissa Remo, (herein after referred to as Plaintiff Remo), files this Original Petition against Defendant, Lyft, Inc. (herein after referred to as Defendant Lyft), and alleges as follows:

**I.**  
**DISCOVERY PLAN LEVEL 3**

1. Plaintiff intends to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4. Plaintiff will seek a Court Order with a discovery control plan shortly after Defendant files its answer.

**II.**  
**CLAIM FOR RELIEF**

2. Plaintiff has sustained injuries and seeks monetary relief not more than \$1,000,000. Plaintiff reserves the right to modify this amount as the circumstances warrant.

**III.**  
**PARTIES**

3. Plaintiff is an individual residing in Bexar County, Texas. The last three numbers of Plaintiff Remo's Social Security Number are 238.

4. Defendant Lyft is business authorized to do business in Bexar County, Texas. Defendant may be served by serving its registered agent, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found in any manner authorized by the Texas Rules of Civil Procedure. Service of process is requested by private process as authorized by this Court.

#### **IV.** **JURISDICTION**

5. This Court has subject-matter jurisdiction over this lawsuit and the damages sought are within the jurisdictional limits of this Court.

#### **V.** **VENUE**

6. Venue is proper in Bexar County, Texas, because the accident that forms the basis of this lawsuit occurred in Bexar County, Texas.

#### **VI.** **FACTS**

7. On or about January 22, 2022, Plaintiff Remo was attempting to open the door to a vehicle driven by a Lyft driver. The third-party driver was on the job and entirely within the course and scope of his employment at the time of the incident that forms the basis of this suite. As Plaintiff Remo's hand was on the door handle to open the door, the third-party driver began to quickly drive away despite knowing there was another individual in the immediate vicinity of the vehicle. During this process Plaintiff's hand was caught on the door handle and she was thrown down to the concrete. Thus, the third-party driver was negligent and such negligence proximately caused the incident in question. Plaintiff Remo has suffered injuries to her right arm, teeth, right

knee, and right shoulder as a result of the incident that forms the basis of this suit.

8. At the time of the collision in question, the unidentified driver was in the course and scope of his employment with Defendant Lyft and was acting in furtherance of Defendant Lyft's interests. Thus, Defendant Lyft is vicariously liable for the negligence of the unidentified individual and is also liable for its own corporate negligence and gross negligence.

**VII.**  
**CAUSES OF ACTION – Negligence**  
**Respondeat Superior**

9. Defendant Lyft is liable to Plaintiff for the negligent acts of the unidentified individual described above under the doctrine of *respondeat superior* because the unidentified individual was in the course and scope of his employment and in active furtherance of the business of Defendant Lyft at the time this accident occurred.

**Negligence – Defendant Lyft**  
**Direct Negligence**

**Negligent Hiring, Training, Retention and/or Supervision**

10. At the time and on the occasion in question, and immediately prior thereto, Defendant Lyft was guilty of negligence in its hiring and/or retaining the driver of the unidentified individual in its employ, agency or representation in that it knew, or in the exercise of reasonable care should have known, that said individual was incompetent and/or unfit to act in such capacity. Defendant Lyft also negligently failed to educate and train the unidentified individual in the safe operation of the vehicle. Defendant Lyft also negligently failed to properly supervise the unidentified individual and also failed to enforce the applicable safety rules and federal regulations.

**VIII.**  
**DAMAGES**

11. As a result of the collision, Plaintiff Remo has suffered serious injuries. Because her bodily injuries were proximately caused by the Defendant's negligence, Plaintiff is entitled to reasonable and proper compensation for all the damages Plaintiff sustained including, but not limited to the following:

- a. past and future medical expenses;
- b. past and future physical pain and mental anguish;
- c. past and future physical impairment; and
- d. past and future disfigurement.

**IX.**  
**JURY DEMAND**

12. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

**X.**  
**PRAYER**

13. Plaintiff prays that they have judgment against Defendant, for actual damages shown and proved at trial, for prejudgment and post-judgment interest, for costs of court and for all other relief, legal and equitable, to which she is entitled.

Respectfully submitted,

THE PACKARD LAW FIRM

By: \_\_\_\_\_

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**Automated Certificate of eService**

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Mercedes Perez on behalf of Daniel Packard  
Bar No. 791392  
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Envelope ID: 62658530  
Status as of 3/16/2022 11:56 AM CST

## Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Mercedes Perez		Mercedes@packardfirm.com	3/16/2022 11:25:11 AM	SENT